

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BLAKE OF CHICAGO CORP., *et al.*,

Debtors.

A.B. DICK COMPANY and
PARAGON CORPORATE HOLDINGS,
INC.,

Plaintiffs,

v.

MHR CAPITAL PARTNERS LP,
MHR INSTITUTIONAL PARTNERS LP,
MHRM LP and MHR FUND
MANAGEMENT LLC,

Defendants.

MHR CAPITAL PARTNERS LP, MHR
INSTITUTIONAL PARTNERS LP, and
MHRM LP,

Third-Party Plaintiffs,

v.

N.E.S. INVESTMENT COMPANY;
ROBERT J. TOMSICH; JOHN H.
FOUNTAIN; A. KEITH DREWETT; JOHN
R. TOMSICH; FRANK D. ZAFFINO;
GREGORY T. KNIPP; JAMES W. WERT;
JOHN KAHL, JR.; DONALD HASTINGS;
BROWN GIBBONS, LAND & COMPANY,
L.P.; and SQUIRE, SANDERS & DEMPSEY
L.L.P.,

Third-Party Defendants.

Chapter 11

Bankr. Case No. 04-12002 (JLP)

Bankr. Adv. No. 05-54141

Jointly Administered

Civ. Action No. 05-00116-KAJ

Civil Action No. 05-00115-KAJ

MOTION AND ORDER
FOR ADMISSION PRO HAC VICE

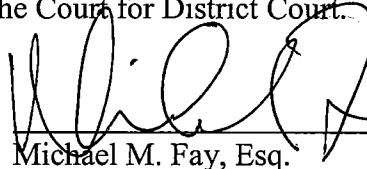
Megan N. Harper, Esquire, a member of the bar of this Court, pursuant to District Court Local Rule 83.5, moves the admission *pro hac vice* of Michael M. Fay, Esquire of Kasowitz, Benson, Torres & Friedman LLP (the “Admittee”), to represent MHR Capital Partners LP, MHR Institutional Partners LP, MHRM LP and MHR Fund Management LLC (“MHR”), in this matter. The Admittee is admitted, practicing, and in good standing in the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Fourth Circuit and is a member in good standing of the bar of the State of New York.

LANDIS RATH & COBB LLP



Megan N. Harper (I.D. No. 4103)
919 Market Street, Suite 600
Wilmington, DE 19801
(302) 467-4400

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted practicing and in good standing in the jurisdiction shown in the paragraph above, submits to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the course of, or in the preparation of, this action, and has access to, or has acquired, a copy of the Local Rules of this Court and is generally familiar with such Rules. I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court for District Court.



Michael M. Fay, Esq.
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IT IS HEREBY ORDERED counsel’s motion for admission pro hac vice is granted.

BY THE COURT:

Dated: _____

The Honorable Kent A. Jordan
United States District Court Judge